

Message

---

**From:** Leon-Guerrero, Tim [Leon-Guerrero.Tim@epa.gov]  
**Sent:** 5/20/2021 3:55:26 PM  
**To:** Burger, Riley [burger.riley@epa.gov]  
**Subject:** RE: Notification - Air Quality Permits (Invenergy NSR/PSD)

Riley,

Just wanted to let you know I talked with ACHD this morning regarding their modeling analysis for Invenergy AEC. It seems this application has been sitting on the shelf for awhile (almost 2 years). I wanted to pass on a few points that came up during the call while they are still fresh in my mind.

First, they do have an air cooled unit and not a mechanical draft cooling unit (water). That was good news from my perspective since the modeling correctly didn't include a source for any water cooled unit.

I noticed a discrepancy in the Auxiliary Boiler unit's modeled PM emission rate between several of the model simulations. ACHD checked and there was one simulation where the Aux Boiler's modeled emission rate was above their permit application limit. Normally they'd have to remodel using the permitted limit to show they were still OK. They didn't want to do that so they are instead going to lower the Aux Boiler unit's permitted PM emission limit so it matches the modeling. Hopefully the applicant won't have a problem with that.

I'm going to work on finalizing my comments. I don't think I have any game changers at this point and asked ACHD to let me know if they have any issues regarding the points I brought up on the call. My goal is to have my comments finalized next week. I believe any comments we have are due June 8<sup>th</sup>, ACHD's closure date. They did say they expect a lot of public comments on this project.

Let me know if you have any questions regarding my review. I'll be out of the office tomorrow but in all of next week.

Tim LG

---

**From:** Burger, Riley <burger.riley@epa.gov>  
**Sent:** Monday, May 17, 2021 10:56 AM  
**To:** Leon-Guerrero, Tim <Leon-Guerrero.Tim@epa.gov>  
**Subject:** RE: Notification - Air Quality Permits (Invenergy NSR/PSD)

Good morning Tim,

Thanks for the update on your review. I have a conflicting call Thursday and since it's modeling focused I will pass on listening in this time.

Regarding your previous questions:

- it does look like emissions limit tables in the review memo are those are included as conditions in the permit itself
- the stack height in the review memo isn't likely enforceable but I imagine these were included in the application and there may be a mechanism for requiring projects to stick to what they indicated in their plans
- I was unable to find information on the air-cooling vs. water cooling materials either

I'm just starting to dig into this one in more depth and will let you know if there's anything significant that pops up. Thanks again for your work on this one!

Riley

**Riley Burger**

Physical Scientist  
Permits Branch (3AD10)  
Air & Radiation Division, EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
215-814-2217

---

**From:** Leon-Guerrero, Tim <[Leon-Guerrero.Tim@epa.gov](mailto:Leon-Guerrero.Tim@epa.gov)>  
**Sent:** Friday, May 14, 2021 10:45 AM  
**To:** Burger, Riley <[burger.riley@epa.gov](mailto:burger.riley@epa.gov)>  
**Subject:** RE: Notification - Air Quality Permits (Invenergy NSR/PSD)

Riley,

I'm trying to finish up my review for the project and have scheduled a call to discuss my review with some folks with ACHD before I finalize my comments. Nothing major so far. They have a modeled 1-hr NO2 violation that I'm hoping to get them to resolve. The plant isn't significantly contributing to the modeled violation so the permit can move forward. I just don't like model violations left unaddressed.

I'm scheduling a call to discuss my review next Thursday the 20<sup>th</sup> from 10-11:30. Let me know if you want to listen in and I'll add you to the invite list. Also, let me know if you have found anything that would impact the modeling review. One question (that just popped into my mind). Does this plant have an air-cooling unit or is it using draft (water) cooling towers? I don't recall if I saw any discussion of that in the materials I have.

Tim LG

---

**From:** Burger, Riley <[burger.riley@epa.gov](mailto:burger.riley@epa.gov)>  
**Sent:** Tuesday, April 13, 2021 3:24 PM  
**To:** Leon-Guerrero, Tim <[Leon-Guerrero.Tim@epa.gov](mailto:Leon-Guerrero.Tim@epa.gov)>  
**Subject:** RE: Notification - Air Quality Permits (Invenergy NSR/PSD)

Hi Tim,

The public comment period ends 6/8. The permits branch internal deadline to contact ACHD to discuss any comments drafted is one week prior, 6/1. I'll likely have my review done before then and will be in contact as things develop

Unless you have a modeling contact you usually correspond with I would suggest reaching out to the permit writer, Bernadette Lipari ([Bernadette.Lipari@AlleghenyCounty.US](mailto:Bernadette.Lipari@AlleghenyCounty.US)).

It looks that Appendix C—Air Quality Modeling Analysis is part of the Review Memo posted online, starting on pg. 44. The review memo also references Section 6 of the application as relevant to modeling and a separate document "Modeling Review of Invenergy LLC (Invenergy) Proposed Natural Gas Combined-Cycle Power Plant Installation Permit". These two documents, and the modeling files themselves, do not appear to be posted.\

Thanks for your help on this!

**Riley Burger**

Physical Scientist  
Permits Branch (3AD10)  
Air & Radiation Division, EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
215-814-2217

---

**From:** Leon-Guerrero, Tim <Leon-Guerrero.Tim@epa.gov>  
**Sent:** Tuesday, April 13, 2021 1:45 PM  
**To:** Chow, Alice <chow.alice@epa.gov>; Opila, MaryCate <Opila.MaryCate@epa.gov>  
**Cc:** Burger, Riley <burger.riley@epa.gov>  
**Subject:** RE: Notification - Air Quality Permits (Invenergy NSR/PSD)

Sure. I'll just need to track down the modeling components. There should be a report along with electronic files. I went to ACHD's website and not all of the appendices are posted (or I just can't find them).

Should I start with the document administrator on the first email? What type of time frame are we working on; when do any comments have to be finished by?

This seems to be a pretty small plant and I do think ACHD's has reached out to me a couple of times as they put this application together. If I'm remembering this correctly, the only minor complicating factor may be that the plant is located along the border of Allegheny County. That may complicate some things since the plant is in a PM-2.5 NAA but it's impacts may extend into neighboring counties that are attainment for that pollutants. Not sure if anyone has run across this possibility and how to handle it.

Tim LG

---

**From:** Chow, Alice <chow.alice@epa.gov>  
**Sent:** Tuesday, April 13, 2021 1:22 PM  
**To:** Opila, MaryCate <Opila.MaryCate@epa.gov>  
**Cc:** Burger, Riley <burger.riley@epa.gov>; Leon-Guerrero, Tim <Leon-Guerrero.Tim@epa.gov>  
**Subject:** RE: Notification - Air Quality Permits (Invenergy NSR/PSD)

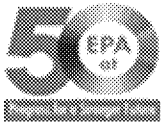
Hi! Tim would be your point of contact!

Alice

---

Alice H. Chow  
Chief, Air Quality Analysis Branch (3AD40)  
Air & Radiation Division (14-130)  
USEPA, Region 3  
Phone: 215-814-2144  
Cell: 215-817-4380  
Email: [chow.alice@epa.gov](mailto:chow.alice@epa.gov)

---



---

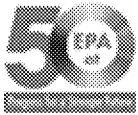
**From:** Opila, MaryCate <[Opila.MaryCate@epa.gov](mailto:Opila.MaryCate@epa.gov)>  
**Sent:** Tuesday, April 13, 2021 1:21 PM  
**To:** Chow, Alice <[chow.alice@epa.gov](mailto:chow.alice@epa.gov)>  
**Cc:** Burger, Riley <[burger.riley@epa.gov](mailto:burger.riley@epa.gov)>  
**Subject:** FW: Notification - Air Quality Permits (Invenergy NSR/PSD)

Hi Alice,

ACHD has a PSD permit (and associated modeling) out to public comment. Is there someone from your office that Riley can work with to review the modeling portion of this project?

Thanks,  
Mary Cate

Mary Cate Opila, P.E., Ph.D.  
Chief, Permits Branch  
Air & Radiation Division  
EPA Region 3  
Mail Code: 3AD10  
1650 Arch Street  
Philadelphia, PA 19103  
215-814-2041



---

**From:** Burger, Riley <[burger.riley@epa.gov](mailto:burger.riley@epa.gov)>  
**Sent:** Tuesday, April 13, 2021 1:05 PM  
**To:** Opila, MaryCate <[Opila.MaryCate@epa.gov](mailto:Opila.MaryCate@epa.gov)>  
**Subject:** FW: Notification - Air Quality Permits (Invenergy NSR/PSD)

Hi MC,

ACHD has begun public notice of the Invenergy NSR/PSD permit, with public comment ending June 8, 2021. They provided a link to permit files on their external webpage, but the modeling files do not appear to be posted here. AQAB may need to reach out to their counterparts for those.

**Riley Burger**  
Physical Scientist  
Permits Branch (3AD10)  
Air & Radiation Division, EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
215-814-2217

---

**From:** Dettlinger, Carl <[Carl.Dettlinger@AlleghenyCounty.US](mailto:Carl.Dettlinger@AlleghenyCounty.US)>  
**Sent:** Thursday, April 08, 2021 11:13 AM

**To:** Johansen, Amy <Johansen.Amy@epa.gov>; angela.marconi@state.de.us; Lehberger, Art <Art.Lehberger@dep.nj.gov>; bob.hodanbosi@epa.state.oh.us; Chris Schwalje <Chris.Schwalje@dep.nj.gov>; Stahl, Cynthia <Stahl.Cynthia@epa.gov>; Wong, Danny <danny.wong@dep.nj.gov>; David Owen <David.Owen@dep.nj.gov>; DEP <ra-epairpermitnotifi@pa.gov>; edward.wiener <edward.wiener@phila.gov>; Etzel, Sandra <Sandra.Etzel@AlleghenyCounty.US>; joanna.french@state.de.us; joel.leon@dep.nj.gov; kassahun.sellassie@phila.gov; Kevin Greener <Kevin.Greener@dep.nj.gov>; Ramamurthy, Krishnan <kramamurth@pa.gov>; Opila, MaryCate <Opila.MaryCate@epa.gov>; Cronin, Michael P (DEC) <michael.cronin@dec.ny.gov>; Burger, Riley <burger.riley@epa.gov>; Hepler, Stephen <shepler@pa.gov>; suna.sariscak@maryland.gov; Tamera Thompson <tamera.thompson@deg.virginia.gov>; Truchan, JoAnn <joann.truchan@alleghenycounty.us>; Yogeshi Doshi <Yogesh.Doshi@dep.nj.gov>

**Subject:** Notification - Air Quality Permits

Dear State/EPA Permit Contact:

Attached is a copy of our most recent notice of applications received, permits in public comment and permitting actions taken. Comments on permits we intend to issue are due on or before 8 June, 2021.

<https://www.alleghenycounty.us/Health-Department/Programs/Air-Quality/Public-Comment-Notices.aspx>

If you have any questions or comments, please do not hesitate to contact us.

Sincerely,



**Carl A. Dettlinger**

Document Administrator

**Air Quality Program**

301 39<sup>th</sup> Street, Bldg. 7

Pittsburgh, PA 15201-1811

**P: 412.578.8191**

**F: 412.578.8144**

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, forwarding, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.